

REMARKS

Claims 1, 3, 4, 6, 7, 9-11, 13 and 14 are pending. Claims 1, 4, 7 and 11 are the only independent claims. Favorable reconsideration is requested.

Claims 1, 4, 7, 10, 11 and 14 were rejected under 35 U.S.C. § 103 over U.S. Patent Publication 2001/0037266 (Schroeder) in view of U.S. Patent 6,981,225 (Gaudette). Claims 3, 6, 9 and 13 were rejected under 35 U.S.C. § 103 over Schroeder and Gaudette and further in view of U.S. Patent 5,852,717 (Bhide et al.). Applicant submits that the independent claims are patentable over the cited art for at least the following reasons.

The present invention, as defined in independent claim 1, relates to a method in which:

a) a first request packet (A1) requests identity of an intended server maintaining a shared data file;

b) a second request packet (A2) requests downloading of the shared data file from the intended server by transmitting the identity of the intended server received from a server to which the first request packet was sent. The second request packet is automatically routed through the network to the intended server. The acquisition of the identity of the intended server from the initial server simplifies the procedure the client terminal has to perform in locating the intended server. Otherwise, the identity of the shared data file would have to be altered for requesting it from a management server; and

c) a third request packet (A3) requests differential data representing the difference between the shared data file currently maintained in the intended server and the one that was downloaded in response to the second request packet.

As a result of the above-mentioned processing these request packets the integrity of the shared data file can be secured. It is not believed that the cited prior art teaches or suggests at least these features of claim 1. The other independent claims recite similar features and are believed patentable for at least the same reasons. For at least this reason, the independent claims are believed patentable over the cited art.

Moreover, Schroeder relates to an image server system that provides access to image files located in an image file server. However, it was conceded in the Office Action that Schroeder contains no teaching of the transmission of the third request packet requesting differential data representing the difference between the shared data file currently maintained in the intended server and the one that was downloaded in response to the second request packet.

Gaudette is now cited to allegedly remedy this deficiency. In the prior Office Action, Boyle et al. had been cited to remedy this deficiency. However, Boyle et al., which is now withdrawn, downloaded from the server *not* differential data, but the complete updated page. This was pointed out in the previous response, in arguments that were found to be persuasive by the Examiner.

Gaudette teaches a method whereby a browser requests of the server the *entire* current Web site. In response to this request, the Web site server downloads to the browser the current, possibly updated, contents of the Web site. After the entire current contents of the Web site have been downloaded, the browser can compare the newly-downloaded *complete Web site* contents with a cached copy of the Web site.

In Gaudette, the *browser* has the ability to compare the newly-downloaded complete current Web site with the copy of the Web site stored in browser's cache, and show the difference between these two versions to the user. In Gaudette, the *complete, updated*

Web site is always what is downloaded from the server to the client terminal running the browser software.

In contrast, in the claims of the present invention, the server is sent a request for differential data. The server only sends to the client terminal differential data representing the difference between the shared data file maintained by the server and the version of the file that had been downloaded previously. Unlike in Gaudette, the server does not send the entire file, unless every bit has been changed. The claimed technique has one advantage in that the bandwidth of the system is not needlessly loaded down by transmission of data that has not changed.

On the other hand, in Gaudette's method, there is no saving of bandwidth because the entire Web page is always downloaded from the server. Just as was the case in Boyle et al., what is downloaded by the client in Gaudette is always *the entire file*. Thus, Gaudette fails to remedy the above-mentioned deficiency of Schroeder as a reference against the independent claims because, even when combined, the references fail to teach the server being requested to send only differential data.

In addition to failing to reduce bandwidth, Gaudette's requires that the browser software be able to handle the comparison between the current version and a previous version, instead of this comparison being done at the server, which would presumably have greater processing capabilities.

In summary, just as was the case with Boyle et al., Gaudette teaches a system in which no request for differential data is sent from the client to the server. In fact, the entire file (Web page in this case) is always sent to the client, which does not have, inter alia, the above-mentioned advantages of the independent claims.

To set forth a prima facie case of obviousness, the cited combination of prior art references must teach or suggest each and every element of the claim. In this case, even if the technique of Gaudette is used with Schroeder, the combination would not read on the claims, at least because in Gaudette the browser requests of the server, not differential data, but the entire updated file, which is then sent from the server to the client.

For at least the above-mentioned reasons, independent claims 1, 4, 7 and 11 are believed clearly patentable over Schroeder and Gaudette.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Dated: August 1, 2006

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